IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

	Ref. No. 7597
Debtors.	(Jointly Administered)
FTX TRADING LTD., et al., 1	Case No. 22-11068 (JTD)
In re:	Chapter 11

NOTICE OF SUBMISSION OF PROPOSED ORDER

PLEASE TAKE NOTICE that, on February 20, 2024, Andrew R. Vara, United States Trustee for Regions 3 & 9, through his counsel, filed the *Notice of Submission of Proposed Form of Order Directing the U.S. Trustee to Appoint an Examiner* [D.I. 7597] attaching as <u>Exhibit</u> <u>A</u> thereto a proposed form of order directing the appointment of an examiner (the "<u>UST Proposed Order</u>").

PLEASE TAKE FURTHER NOTICE that the above-captioned debtors and debtors-in-possession (the "<u>Debtors</u>") hereby submit a competing proposed form of order directing the appointment of an examiner (the "<u>Debtors Proposed Order</u>"), a copy of which is attached hereto as <u>Exhibit 1</u>. A copy of the Debtors Proposed Order compared against the UST Proposed Order is attached hereto as <u>Exhibit 2</u>.

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

Dated: February 22, 2024 Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Kimberly A. Brown

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004

Telephone: (212) 558-4000 Facsimile: (212) 558-3588

E-mail: dietdericha@sullcrom.com bromleyj@sullcrom.com gluecksteinb@sullcrom.com kranzleya@sullcrom.com

Counsel for the Debtors and Debtors-in-Possession